

# **Exhibit A**

PASICH<sup>u</sup>

Kirk Pasich (SBN 94242)  
 KPasich@PasichLLP.com  
 Kayla Robinson (SBN 322061)  
 KRobinson@PasichLLP.com  
 Owen Monkemeier (SBN 336476)  
 OMonkemeier@PasichLLP.com  
 PASICH LLP  
 10880 Wilshire Blvd., Suite 2000  
 Los Angeles, California 90024  
 Telephone: (424) 313-7860  
 Facsimile: (424) 313-7890

Attorneys for Defendant  
 and Counter-Claimant

**UNITED STATES DISTRICT COURT  
 CENTRAL DISTRICT OF CALIFORNIA**

NEW YORK MARINE AND  
 GENERAL INSURANCE COMPANY,  
 a New York corporation,

Plaintiff,

v.

AMBER HEARD,

Defendant.

AND RELATED COUNTERCLAIM

Case No. 2:22-cv-4685-GW (PDx)  
 Hon. George H. Wu, Courtroom 9D

**DEFENDANT AND CROSS-  
 COMPLAINANT AMBER  
 HEARD'S INITIAL  
 DISCLOSURES**

Complaint Filed July 8, 2022

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, defendant and cross-complainant Amber Heard makes the following disclosures to plaintiff and counter-defendant New York Marine and General Insurance Company ("New York Marine"):

**I. WITNESSES**

The following is a list of witnesses Ms. Heard currently believes are likely to have discoverable information that Ms. Heard may use to support her claims in this lawsuit. Ms. Heard reserves the right to identify other individuals as investigation and discovery proceed:

NAME AND CONTACT INFORMATION (IF KNOWN)	SUBJECT(S) OF INFORMATION
Amber Heard, insured Contact through counsel	The <i>Depp</i> lawsuit; communications between Ms. Heard and New York Marine regarding Ms. Heard's losses; New York Marine's refusal to defend Ms. Heard or pay for Ms. Heard's losses
Integro USA, Inc. 21650 Oxnard St., Suite 2350 Woodland Hills, CA 91367-7824	Ms. Heard's procurement of the Policy
Pamela Johnson, claim professional handling the <i>Depp</i> lawsuit on behalf of Travelers	The <i>Depp</i> lawsuit; communications between Travelers and New York Marine regarding Ms. Heard's losses; New York Marine's refusal to defend Ms. Heard or pay for Ms. Heard's losses
Steven Battaglia, New York Marine	Communications between Ms. Heard and New York Marine regarding Ms. Heard's claim for coverage for the <i>Depp</i> lawsuit

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1 2 3 4 5 6 7 8 9	Jeremiah T. Reynolds Partner Eisner LLP 9601 Wilshire Blvd., 7th Floor Beverly Hills, CA 90210 T 310.855.3200 D 310.888.4119 F 310.855.3201 jreynolds@eisnerlaw.com	The <i>Depp</i> lawsuit; communications between Ms. Heard and New York Marine regarding Ms. Heard's claim for coverage for the <i>Depp</i> lawsuit; New York Marine's refusal to defend Ms. Heard or pay for Ms. Heard's losses
10 11 12 13 14 15 16	Richard A. Schwartz Browne George Ross LLP 801 So. Figueroa Street, Suite 2000 Los Angeles, CA 90017 T 213.725.9800 F 213.725.9808 rschwartz@bgrfirm.com	The <i>Depp</i> lawsuit; Ms. Heard's losses
17 18 19 20 21 22 23	Edward W. Cameron Timothy J. McEvoy Sean Patrick Roche Cameron McEvoy, PLLC 4100 Monument Corner Drive, #420 Fairfax, VA 22030 T 703.273.8898	The <i>Depp</i> lawsuit; communications between Ms. Heard and New York Marine regarding Ms. Heard's claim for coverage for the <i>Depp</i> lawsuit; New York Marine's refusal to defend Ms. Heard or pay for Ms. Heard's losses

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1	John Quinn	The <i>Depp</i> lawsuit; Ms. Heard's losses
2	Roberta Kaplan	
3	Kaplan Hecker & Fink LLP	
4	350 Fifth Avenue, Suite 7110	
5	New York, NY 10118	
6	T 212.763.0886	
7	C 610.952.4726	
8	jquinn@kaplanhecker.com	
9	Elaine Charlson Bredehoft	The <i>Depp</i> lawsuit; communications
10	Charlson Bredehoft Cohen & Brown,	between Ms. Heard and New York Marine
11	P.C.	regarding Ms. Heard's claim for coverage
12	11260 Roger Bacon Drive	for the <i>Depp</i> lawsuit; New York Marine's
13	Suite 201	refusal to defend Ms. Heard or pay for Ms.
14	Reston, VA 20190	Heard's losses
15	T (703) 318-6800	
16	C (703) 919-2735	
17	F (703) 318-6808	
18	Ben Rottenborn	The <i>Depp</i> lawsuit; Ms. Heard's losses
19	Woods Rogers PLC	
20	10 S. Jefferson Street	
21	Suite 1400	
22	Roanoke, VA 24011	
23	T 540.983.7540	
24	F 540.983.7711	
25	brottenborn@woodsrogers.com	

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1	Lee S. Brenner	The <i>Depp</i> lawsuit; Ms. Heard's losses
2	Venable LLP	
3	Chair, Entertainment and Media	
4	Litigation Group	
5	2049 Century Park East, Suite 2300	
6	Los Angeles, CA 90067	
7	T 310.229.0443	
8	F 310.229.9901	
9	LSBrenner@Venable.com	
10	Anya J. Goldstein	The <i>Depp</i> lawsuit; Ms. Heard's losses
11	Summa LLP	
12	800 Wilshire Blvd., Suite 1050	
13	Los Angeles, CA 90017	
14	T 213.260.9451	
15	Brian Kramer	The <i>Depp</i> lawsuit; Ms. Heard's losses
16	Kramer Family Law	
17	12100 Wilshire Blvd., Suite 800	
18	Los Angeles, CA 90025	
19	T 424.228.4133	
20	bkramer@bjkpc.com	
21	Craig J. Mariam	The <i>Depp</i> lawsuit; Ms. Heard's losses
22	Gordon & Rees LLP	
23	633 West Fifth Street, 52nd Floor	
24	Los Angeles, CA 90071	
25	T 213.576.5000	
26	F 877.306.0043	
27	cmariam@gordonrees.com	

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1	Wilson Elser Moskowitz Edelman &	The <i>Depp</i> lawsuit; Ms. Heard's losses
2	Dicker LLP	
3	1133 Westchester Avenue	
4	White Plains, NY 10604	
5	TD 914.872.7287	
6	T 914.323.7000	
7	F 914.323.7001	
8	Attorneys at Pasich LLP representing	Ms. Heard's costs of pursuing coverage
9	Ms. Heard in connection with her	under the Policy
10	claim for coverage and/or this action	
11	Counsel for New York Marine in	Nonprivileged communications relating to
12	connection with this action	Ms. Heard's claim for coverage for the
13		<i>Depp</i> lawsuit
14	New York Marine's person(s) most	New York Marine's handling of Ms.
15	knowledgeable regarding Ms. Heard's	Heard's claim for coverage
16	claim for coverage	
17	New York Marine's person(s) most	The drafting of the policy form
18	knowledgeable regarding the drafting	
19	of New York Marine Policy number	
20	GL201800012500	
21	New York Marine's employees and	Ms. Heard's communications with New
22	agents—including underwriting,	York Marine and its representatives; New
23	insurance personnel, and in house or	York Marine's handling of Ms. Heard's
24	outside counsel—who sent or received	claim for coverage
25	communications regarding Ms.	
26	Heard's claim for coverage	

1 New York Marine's employees and  
2 agents who participated in  
3 investigating and adjusting Ms.  
4 Heard's claim for coverage

New York Marine's handling of Ms.  
Heard's claim for coverage

5 New York Marine's employees and  
6 agents who participated in creating,  
7 modifying, and/or approving New  
8 York Marine's coverage position with  
9 respect to Ms. Heard's claim for  
10 coverage

New York Marine's handling of Ms.  
Heard's claim for coverage

## 12 **II. DOCUMENTS**

13 Ms. Heard believes the following are documents, electronically stored  
14 information, and tangible things that Ms. Heard has in her possession, custody, or  
15 control and may use to support her claims or defenses, including:

- 16 • The Policy;
- 17 • Documents in the underlying *Depp* lawsuit;
- 18 • Non-privileged documents concerning New York Marine's handling of  
19 Ms. Heard's claim for coverage for the *Depp* lawsuit, including  
20 coverage correspondence regarding Ms. Heard's claim; and
- 21 • Documents concerning and supporting Ms. Heard's claim for damages  
22 in this lawsuit, including documents substantiating the legal fees and  
23 costs paid by Ms. Heard in connection with the *Depp* lawsuit and  
24 documents substantiating Ms. Heard's claim for *Brandt* fees.

25 Ms. Heard reserves the right to use any document identified and/or produced by  
26 New York Marine, as well as any publicly available documents that can be  
27 judicially noticed. Ms. Heard also reserves the right to supplement her initial  
28



1 identification of documents based upon information obtained during the discovery  
2 process.

### 3 **III. DAMAGES**

4 The following is a computation of each category of damages Heard seeks, to  
5 the extent that the amounts of these damages are currently known and calculable:

- 6 • At least \$4,400,000 in unreimbursed legal fees and costs incurred by  
7 Ms. Heard in the defense of the *Depp* lawsuit;
- 8 • Interest at the legal rate;
- 9 • Attorneys' fees and costs incurred in obtaining the benefits due under  
10 the policies at issue in an amount to be determined, and continuing,  
11 pursuant to *Brandt v. Superior Court*, 37 Cal. 3d 813 (1985); and
- 12 • Punitive damages in an amount to be determined and sufficient to  
13 punish, deter, and make an example out of New York Marine.

14 Discovery and investigation are ongoing and Heard reserves her right to amend her  
15 damages computation as investigation and discovery proceeds.

17 DATED: February 23, 2023

PASICH LLP

18 By:   
19 Kayla Robinson

20 Attorneys for Defendant and Counter-Claimant  
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27  
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**PROOF OF SERVICE**

***New York Marine and General Insurance Company. v. Amber Heard***  
**U.S.D.C. Central Dist. California Case No. 2:22-cv-4685-GW (PDx)**

**STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 1230 Rosecrans Avenue, Suite 690, Manhattan Beach, CA 90266.

On February 23, 2023, I served true copies of the following document described as **DEFENDANT AND CROSS-COMPLAINANT AMBER HEARD'S INITIAL DISCLOSURES** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an agreement of the parties to accept service by e-mail or electronic transmission, I caused the document(s) to be sent from e-mail address JFernandez@pasichllp.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on February 23, 2023, at Los Angeles, California.

\_\_\_\_\_  
 Juanita Fernandez

PASICH<sup>u</sup>

1 Mark D Peterson  
2 Cates Peterson LLP  
3 4100 Newport Place Suite 230  
4 Newport Beach, CA 92660  
E-Mail: markpeterson@catespeterson.com

*Attorneys for Travelers  
Commercial Insurance  
Company*

5 Nicholas H Rasmussen  
6 Graham Van Leuven  
7 James P Wagoner  
8 McCormick Barstow Sheppard Wayte  
9 and Carruth LLP  
10 7647 North Fresno Street  
11 Fresno, CA 93720  
E-Mail:nicholas.rasmussen@mccormickbarstow.com  
graham.vanleuven@mccormickbarstow.com  
jim.wagoner@mccormickbarstow.com

*Attorneys for New York  
Marine and General  
Insurance Company*